

LAW OFFICES
WILLIAMS & CONNOLLY_{LLP*}

KATHERINE A. TREFZ
(202) 434-5038
ktrefz@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
(202) 434-5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

August 14, 2024

Via ECF

MEMO ENDORSED

Hon. Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
Courtroom 11B
New York, NY 10007-1312

Re: United States v. Anton Peraire-Bueno and James Peraire-Bueno, Case No. 1:24-cr-00293; Consent Motion to Modify Defendants' Bond Conditions

Dear Judge Clarke:

With the consent of Pretrial Services and the government, Defendants James Peraire-Bueno ("James") and Anton Peraire-Bueno ("Anton") respectfully request modification to their bond conditions to remove the GPS or location monitoring and related curfew conditions.

At their initial appearances, GPS or location monitoring and curfew restrictions were imposed as conditions of release for both James and Anton, in addition to other restrictions such as those related to securing their bonds, travel, and trading. Doc. 8, 20. Both defendants have perfected the required bonds and complied with their conditions of release since their arrests in May of this year.

The GPS or location monitoring and curfew restrictions are no longer required to reasonably assure James and Anton's presence in court. *See* 18 U.S.C. 3142(c)(1)(B) (requiring imposition of the least restrictive conditions that will reasonably assure the appearance of the defendant). James and Anton therefore respectfully request that their conditions of release be modified to remove the conditions requiring GPS or location monitoring and curfews.

All other conditions of release would remain in effect for both defendants: appearance bonds of \$250,000 for each, which have been secured by real property owned by their parents; surrender of passports and prohibition on obtaining new passports; travel limitations; prohibition on possession of firearms; supervision as directed by pretrial services; prohibition on discussing case with co-defendant except in the presence of counsel; prohibition on trading securities, commodities, or cryptocurrency, or validating blockchain transactions; and

WILLIAMS & CONNOLLY^{LLP}
Consent Motion to Modify Bond Conditions
August 13, 2024
Page 2

requirement for pretrial services permission to open new business/personal accounts, cryptocurrency accounts, loans, liens, or lines of credit.

Counsel for the government and the defendants' respective Pretrial Services officers all consent to these requested modifications. Undersigned counsel will be prepared to address this request at the August 19, 2024 pretrial conference, if useful for the Court.

Sincerely,

/s/ Katherine Trefz

Application GRANTED. Defendants James Peraire-Bueno and Anton Peraire-Bueno's conditions of bail are modified to lift the restriction of curfew enforced by location monitoring and/or GPS. All other condition of bail shall remain in effect. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 33.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: August 15, 2024
New York, New York

Katherine Trefz (*pro hac vice*)
Daniel Shanahan (*pro hac vice*)
Williams & Connolly LLP
680 Maine Ave., S.W.
Washington, D.C. 20024
Tel: 202-434-5000
ktrefz@wc.com
dshanahan@wc.com

Jonathan P. Bach
Shapiro Arato Bach
1140 Avenue of the Americas
17th Floor
New York, NY 10036
Tel: 212-257-4897
jbach@shairoarato.com

*Attorneys for Defendant
James Peraire-Bueno*

/s/ William Fick

Daniel N. Marx
William W. Fick (*pro hac vice*)
Fick & Marx LLP
24 Federal Street, 4th Floor
Boston, MA 02110
Tel: 857-321-8360
dmarx@fickmarx.com
wfick@fickmarx.com

Attorneys for Defendant Anton Peraire-Bueno